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Attorneys for Plaintiffs

In re:

JORGE L. PANEQUE and BELKIS L. PANEQUE,
Joint Debtors.

ESTATE OF BASILIO VILLAREAL and
BMV, INC.,

Plaintiffs,

vs.

JORGE L. PANEQUE, d/b/a PANEQUE
ACCOUNTING SERVICES, LEOBIGILDA
PANEQUE, a/k/a BELKIS L. PANEQUE,

Defendants.

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
HONORABLE VINCENT F. PAPALIA, U.S.B.J

Case No. 13-25816-DHS

Chapter 7

Adversary Proceeding No. 13-02023-VFP

**PLAINTIFF'S NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

HEARING DATE AND TIME

May 18, 2015 at 2:00 .p.m.

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that on May 18, 2015 at 2:00 p.m. or soon thereafter as counsel may be heard, the undersigned counsel for the Plaintiff Estate of Basilio Villareal and BMV, Inc. (collectively, "Plaintiffs") shall move before the Honorable Vincent F. Papalia, U.S.B.J. of the United States Bankruptcy Court for the District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Third Floor, Newark, New Jersey 07102, for the entry of an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure, made applicable

to these proceedings by Federal Rule of Bankruptcy Procedure 7056, granting the Plaintiffs summary judgment on all counts of the Complaint (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the undersigned shall rely upon the accompanying Declaration of Jennifer Rodriguez, Statement of Undisputed Material Facts, and Memorandum of Law. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion or the proposed Order must be (i) made in writing; (ii) electronically filed with the Bankruptcy Court; (iii) delivered to the Chambers of the Honorable Vincent F. Papalia, United States Bankruptcy Judge, United States Bankruptcy Court, District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Third Floor, Newark, New Jersey 07102; (iv) mailed to MEDINA LAW FIRM LLC, The Chrysler Building, 405 Lexington Avenue, Seventh Floor, New York, NY 10174, Attn.: Eric S. Medina, Esq.; in accordance with the Local Rules of the United States Bankruptcy Court for the District of New Jersey.

[REMAINDER OF PAGE INTENTIONALLY OMITTED]

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the requested relief may be granted without a hearing. If an objection is filed, the moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Respectfully submitted,

By: /s/Eric S. Medina

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DATED: April 9, 2015